

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MAY -3 2017

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON LEE HUNT,

Defendant.

No.

**4:17CR00197 AGF/NCC**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal,  
whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed

data processing device performing logical, arithmetic or storage functions, including any data storage

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. On or about November 29, 2010, in the United States District Court for the Eastern District of Missouri, in United States of America v. Jason Hunt, Cause Number 4:10 CR 439 AGF, defendant pleaded guilty to the felonies of Receipt of Child Pornography and Possession of Child Pornography and was sentenced on March 2, 2011.

4. Between on or about February 4, 2017, and on or about February 27, 2017, within the Eastern District of Missouri and elsewhere,

**JASON LEE HUNT,**

the defendant herein, knowingly transported images of child pornography using any means or facility of interstate and foreign commerce, that is, the defendant transported graphic image files via the Internet which contained child pornography, including, but not limited to, the following:

a. “Grindr Chat 9.jpg,” a graphic image file that depicts a male inserting his penis into the anus of a prepubescent minor male;

b. “Grindr Chat 11.jpg,” a graphic image file of a prepubescent minor male in a lascivious display of his genitals and a male inserting his penis into the anus of a prepubescent minor male;

In violation of Title 18, United States Code, Sections 2252A(a)(1).

**COUNT II**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about February 27, 2017, within the Eastern District of Missouri, and elsewhere,

**JASON LEE HUNT,**

the Defendant herein, did knowingly possess material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, an LG smart cellular telephone, said LG smart cellular telephone having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said LG smart cellular telephone contained child pornography, including but not limited to, the following:

1. “DD1.mp4” – a graphic video file that depicts, in part, a woman inserting an object into the vagina of a prepubescent minor female, tying the child to a rod and holding the child

upside down, taping the child's hands and feet and taping the child's mouth shut, and attaching objects to the child's nipples and vagina;

2. "DD4.mp4" – a graphic video file that depicts, in part, a woman performing oral sex on a prepubescent minor female;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

A TRUE BILL.

---

FOREPERSON

CARRIE COSTANTIN  
Acting United States Attorney

---

ROBERT F. LIVERGOOD, #35432MO  
Assistant United States Attorney